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U.S. DISTRICT COURT E.D.N.Y.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

★ AUG 03 2006

8/24/06
LONG ISLAND OFFICE

U.S. PHILIPS CORPORATION,
a Delaware corporation,
Plaintiff/Counterclaim Defendant,

v.

ZWT, INC., a New Jersey corporation, and
HARMINDER BHASIN, RAMEET BHASIN,
GURVINDER BINDRA, JOHN IANNOTTI,
and ASIF JAMAL, individuals,
Defendants/Counterclaim Plaintiffs.

) Civil Action No. CV 05-3892 (TCP)(ARL)

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**STIPULATED FINAL CONSENT
JUDGMENT ORDER**
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Plaintiff/Counterclaim Defendant U.S. Philips Corporation ("Plaintiff") and Defendants/Counterclaim Plaintiffs ZWT, Inc. ("ZWT"), Harminder Bhasin, Rameet Bhasin, Gurvinder Bindra, John Iannotti, and Asif Jamal (collectively, "Defendants"), through their attorneys, stipulate and agree that, and it is Ordered that:

1. Pursuant to Fed. R. Civ. P. 54(b), this Court enters this Stipulated Final

Consent Judgment.

2. Without admitting or denying liability, upon entry of this Stipulated Final Consent Judgment Order, Defendants, all successors and assigns of ZWT, their officers, agents, servants, employees, and attorneys, and those persons in active concert or participation with them who receive actual notice of this order by personal service or otherwise, are hereby enjoined and restrained from, directly or indirectly:

(a) making, replicating, selling, offering for sale, importing,
advertising, promoting, marketing, or otherwise disposing of DVD discs that meet

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the industry standards for DVD discs anywhere in the United States or its territories, during the respective terms of U.S. Patent Nos. 5,745,641 and 5,790,512 ("the '641 and '512 Patents"), without express license or other authority from Plaintiff; provided, however, that nothing in this paragraph shall enjoin or restrain any such persons or entities from selling, offering for sale, importing, advertising, promoting, marketing, or otherwise disposing of DVD discs that have been manufactured by entities licensed by Plaintiff;

- (b) inducing or contributing to the infringement of any claims of the '641 and '512 Patents with such DVD discs; and
- (c) effecting assignments or transfers, forming new entities or associations, or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (a)-(b), above.

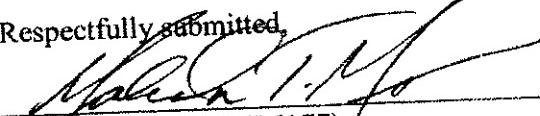
3. Pursuant to Fed. R. Civ. P. 41(a)(1)(ii), Defendants dismiss with prejudice their counterclaims against Plaintiff.

4. All parties waive any right to any further relief in connection with the complaint or counterclaims.

SO STIPULATED:

Dated: 8/3/06, 2006

Respectfully submitted,


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Attorneys for Plaintiff/Counterclaim Defendant
U.S. PHILIPS CORPORATION

Dated: July 31, 2006

Respectfully submitted,

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-and-

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Attorneys for Defendants/Counterclaimants
ZWT, INC., HARMINDER BHASIN, RAMEET
BHASIN, GURVINDER BINDRA, JOHN
JANNOTTI, AND ASIF JAMAL

SO ORDERED, this 9th day of August, 2006.

The Clerk
UNITED STATES DISTRICT JUDGE

Judgment Entered.

L. Saylor
Robert C. Heinemann, Clerk

USDC/EDNY DATE: 8/21/06



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August 4, 2006

By ECF and OVERNIGHT MAIL

Honorable Thomas C. Platt
United States District Court
Eastern District of New York
Long Island Federal Courthouse
814 Federal Plaza
Central Islip, New York 11722-4451

Re: *Philips v. ZWT et al., No. CV 05-3892 (TCP)(ARL) (E.D.N.Y.)*

Dear Judge Platt:

This firm is co-counsel for Plaintiff U.S. Philips Corporation (“Philips”) in the above-referenced patent infringement civil action.

The parties have entered into a proposed Stipulated Final Consent Judgment Order. If approved by the Court, the proposed Stipulated Final Consent Judgment Order would constitute a final disposition of this action. We respectfully request the Court to enter the proposed Stipulated Final Consent Judgment Order submitted herewith.

Respectfully submitted,

/s/ Patrick Collins
Patrick Collins (PC 8093)
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cc: John D. D’Ercole, Esq. (by ECF and facsimile)
J. Ted Donovan, Esq. (by ECF and facsimile)